

54. The process in accordance with claim 47, wherein the fibers are at least one of glass and carbon fibers.

55. The process in accordance with claim 42, wherein a concentration of the metallic fillers is substantially uniformly distributed within the elastic matrix material.

56. The process in accordance with claim 55, wherein the metallic fillers comprise metal powder.

57. The process in accordance with claim 55, wherein the metallic fillers comprise at least one of metal fibers and metal coated fibers.

58. The process in accordance with claim 42, wherein a concentration of the metallic fillers increases in a radially inwardly direction toward the hard roller core.

59. The process in accordance with claim 58, wherein the metallic fillers comprise metal powder.

60. The process in accordance with claim 58, wherein the metallic fillers comprise at least one of metal fibers and metal coated fibers.

REMARKS

Summary of the Amendment

Upon entry of the above amendment, claims 1 and 42 will have been amended and the text of each pending claim will have been presented for the convenience of the Examiner. Accordingly, claims 1, 2, 4, - 27, and 29 - 60 remain currently pending. However, as claims 4 - 10, 37, 40, and 42 - 60, directed to the subject matter of the non-elected species or

invention, remain withdrawn from consideration, only claims 1, 2, 11 - 27, 29 - 36, 38, 39, and 41 are currently under consideration.

Summary of the Official Action

In the instant Office Action, the Examiner has rejected claim 26 based upon formal matters and claims 1, 2, 11 - 27, 29 - 36, 38, 39, and 41 over the art of record. By the present amendment and remarks, Applicants submit that the rejections have been overcome, and respectfully request reconsideration of the outstanding Office Action and allowance of the present application.

Entry of Instant Amendment is Proper

Applicants submit that, as the instant amendment places the application in condition for allowance, entry of the amendment is proper.

Further, Applicants note that the instant amendment does not raise any question of new matter nor any new issues for consideration by the Examiner. In particular, Applicants note that the Examiner has considered the newly recited features of the independent claims in withdrawing the previous rejection over YAMAMOTO.

In this regard, Applicants note that, in their previous response, YAMAMOTO was distinguished over the instant invention by pointing out that, in contrast to the roller of the instant invention, YAMAMOTO's roller is used in a printer or copier, and, therefore, is not structured or arranged to smooth a paper web. Moreover, Applicants pointed out that, as the smoothing rolls of the instant invention have lengths between 3 and 12 meters and diameters

between 450 to 1500 mm, which are now recited in the pending claims, the rolls of the present invention are utilized in a wholly distinct field of endeavor than the copier/printer roller of YAMAMOTO.

Accordingly, Applicants request entry and consideration of the same by the Examiner.

Traversal of Rejection Under 35 U.S.C. § 112, First Paragraph

Applicants traverse the rejection of claim 26 under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one ordinarily skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. In particular, the Examiner asserts that it is unclear how the outer surface can be smooth if the fibers penetrate the outer surface. Applicants traverse the Examiner's assertions.

Applicants direct the Examiner's attention to Figure 3 and its accompanying text, which shows a metal layer provided over a radial outer surface of the elastic coating layer. Moreover, it is noted that, while the fillers can penetrate the radial outer surface of the elastic coating layer, as recited in claim 26, the elastic coating layer has a smooth surface formed by the metal layer for smoothing the web.

Accordingly, Applicants submit that the original disclosure provides ample support for the subject matter recited in claim 26, and request that the Examiner reconsider and withdraw the instant rejection and indicate that this claim is in conformance with the formal requirements of 35 U.S.C. § 112, first paragraph.

Traversal of Rejection Under 35 U.S.C. § 112, Second Paragraph

Applicants traverse the formal rejection of claim 26 under 35 U.S.C. § 112, second paragraph, as being indefinite.

For the reasons set forth above, Applicants submit that claim 26 clearly and unambiguously sets forth the subject matter that Applicants regard as their invention.

Accordingly, Applicants request that the Examiner reconsider and withdraw the formal rejection under 35 U.S.C. § 112, second paragraph, and indicate that this claim is fully in compliance with the requirements of the statute.

Traversal of Rejection Under 35 U.S.C. § 102(b)

Applicants traverse the rejection of claims 1, 2, 11, 14 - 23, 25, 29 - 33, 35, 36, 38, 39, and 41 under 35 U.S.C. § 102(b) as being anticipated by EDDY et al. (U.S. Patent No. 4,321,033) [hereinafter “EDDY”]. The Examiner asserts that EDDY shows an elastic roller having a hard core 17, an elastic coating 19 comprising an elastic matrix material and fillers 12 arranged within the matrix material to improve thermal conductivity of the elastic layer so that heat will be dissipated toward the hard core and dissipated axially by the hard core. The Examiner asserts that the features regarding heat dissipation are intended use and do not structurally distinguish the instant invention over EDDY. Applicants traverse the Examiner’s assertions.

Applicants’ independent claim 1 recites, *inter alia*, a hard roller core, an elastic coating layer at an outer side of said hard roller core comprising an elastic matrix material

and fillers imbedded in said matrix material, and at least a portion of said fillers comprising metallic fillers arranged to improve thermal conductivity of said elastic coating layer such that heat is dissipated toward the hard roller core and dissipated axially by the hard-roller core, wherein the elastic coating layer has a smooth surface structured and arranged for smoothing paper webs and wherein said elastic roller is formed with a length within a range of 3 to 12 m and a diameter within a range of 450 to 1500 mm and is structured to withstand compressive forces of up to 130 N/mm². Applicants submit that EDDY fails to anticipate at least the above-noted features.

Applicants note that, while showing a hard core and metallic fibers (brush) within an elastomeric material, the roll of EDDY is specially designed with a heating element within the core to radiate heat outwardly. In fact, EDDY discloses that the roll is constructed so that the thermal conductivity of the brush and elastomeric material is three times the thermal conductivity of the elastomeric material alone. In this manner, a lower temperature can be utilized by the heating element of EDDY in the core, while ensuring the high surface temperature needed to transfer heat to the surfaces of the copier intended to fuse the toner powder image to a support or sheet due to the increasing heat emanating through the arrangement of the brush and elastomeric material.

Thus, Applicants note that, in contrast to the instant invention, EDDY expressly discloses that the brush and elastomer are arranged to increase the thermal conductivity

outwardly from the heated core. In other words, EDDY explicitly discloses that the roll is formed to radiate heat, i.e., increase heat radially outwardly, so that this heat can be transferred to surfaces in the copier to ensure satisfactory fusing of the toner powder image to a support or sheet. Thus, Applicants submit that EDDY fails to disclose the recited heat dissipation of at least independent claim 1, which draws heat away from its outer surface, i.e., that at least a portion of the fillers, which include metallic fillers, are arranged to improve *thermal conductivity* of said elastic coating layer such that *heat is dissipated toward the hard roller core.*

Moreover, as EDDY specifically discloses a heating element within the core in order to supply the heat to radiate outwardly, so as to transfer sufficient heat to the surfaces involved in fusing the toner powder image, Applicants further submit that EDDY fails to provide any teaching that the roll core of EDDY would axially dissipate heat.

In fact, Applicants submit that EDDY is structured to operate in an exactly opposite manner than the invention recited in at least independent claim 1. That is, EDDY is structured to ensure uniform heat radiating to the outer surface of the fusing roll to heat surfaces of the copier/printer in order to satisfactorily fuse the toner powder image to the support or sheet, whereas the pending claims recite at least a portion fillers arranged to improve *thermal conductivity* of said elastic coating layer to *dissipate heat toward the hard roller core* and the roller core is provided to *dissipate heat axially.*

Applicants further submit that this heat dissipation is not an intended use of the device, but is a characteristic property of the roll due to its specific construction and arrangement of elements, just as the roll of EDDY is specially constructed to ensure that heat radiates outwardly in order to achieve the desired fusing in the copier/printer. Therefore, Applicants submit that the arrangement of elements for heat dissipation is entitled to patentable weight, and must be shown in the applied art in order to anticipate the instant invention.

In view of the foregoing, Applicants submit that EDDY fails to disclose at least a portion of said fillers comprising metallic fillers arranged to improve thermal conductivity of said elastic coating layer *such that heat is dissipated toward the hard roller core and dissipated axially by the hard roller core*, as recited in at least independent claim 1.

Accordingly, Applicants submit that, as EDDY fails to disclose at least the above-noted features of Applicants' invention, that this document fails to provide an adequate evidentiary basis to support a rejection of anticipation under 35 U.S.C. § 102(b). Thus, Applicants submit that this rejection is improper and should be withdrawn.

Further still, Applicants note that EDDY, like YAMAMOTO in the previous Official Action, is used in a printer or copier, which is in stark contrast to the roller of the instant invention. In this regard, the roller of EDDY is arranged to heat surfaces within the copier/printer in order to fuse the toner powder image onto a support or sheet and, therefore,

is not structured or arranged to smooth a paper web. In fact, Applicants note that, as EDDY only discloses that the roll is intended for heating surfaces in the copier/printer for fusing a toner powder image, there is no disclosure that the roll has a smooth surface structured and arranged for smoothing paper webs.

Moreover, Applicants note that, as the rollers of EDDY are specifically intended for use in a copier/printer, there is certainly no disclosure that these rollers have lengths between 3 and 12 meters and diameters between 450 to 1500 mm, as recited in at least independent claim 1, as now amended. Further still, Applicants note that, as there is no teaching within EDDY of any pressures exerted on the fusing roll, the applied art likewise fails to provide any teaching or suggestion that the roll is structured and arranged to withstand compressive strain of up to 130 N/mm^2 , as recited in independent claim 1, as now amended.

Further, Applicants submit that claims 2, 21, 25, 29 - 36, and 39 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that YAMAMOTO fails to anticipate, *inter alia*, said hard roller core comprises metal, and wherein said metallic fillers comprise metal, as recited in claim 2; at least a portion of said metallic fillers comprises one of metal fibers, metal rovings, metal-coated fibers, and metal-coated rovings, as recited in claim 11; at least a portion of said fibers is aligned in the axial direction, as recited in claim 14; said at least a portion of said fibers

comprises a predominant portion of said fibers, as recited in claim 15; at least a portion of said fibers is aligned in the radial direction, as recited in claim 16; said at least a portion of said fibers comprises a predominant portion of said fibers, as recited in claim 17; at least a portion of said fibers is aligned in statistical distribution, as recited in claim 18; said at least a portion of said fibers comprises a predominant portion of said fibers, as recited in claim 19; said fibers are arranged in one of a fiber layer and radially sequentially arranged fiber layers, as recited in claim 20; at least a portion of said metallic fillers are elastically formed, as recited in claim 21; said elastic layer further comprising additional fillers arranged in said elastic matrix material, as recited in claim 22; said additional fillers comprise fibers including at least one of carbon and glass fibers, as recited in claim 23; said metallic fillers are arranged to extend up to a radially outer surface of said elastic matrix material, as recited in claim 25; a portion of said metallic fillers are arranged to extend radially inwardly up to a surface of said hard roller core, as recited in claim 29; a thermal expansion coefficient of said metallic fillers is smaller than a thermal expansion coefficient of said matrix material, as recited in claim 30; said thermal expansion coefficient of said metallic fillers is substantially the same as a thermal expansion coefficient of said hard roller core, as recited in claim 31; said coating layer comprises a functional layer arranged in a radially outwardly region and a connecting layer arranged in a radially inwardly region, wherein said connecting layer is adapted to connect said functional layer to said hard roller core, and wherein said metallic fillers are

arranged at least in said functional layer, as recited in claim 32; said matrix material comprises a plastic material, as recited in claim 33; said matrix material comprises a resin-hardener combination, as recited in claim 35; a concentration of said metallic fillers is substantially uniformly distributed within said elastic matrix material, as recited in claim 36; said metallic fillers comprise at least one of metal fibers and metal coated fibers, as recited in claim 38; a concentration of said metallic fillers increases in a radially inwardly direction toward said hard roller core, as recited in claim 39; and said metallic fillers comprise at least one of metal fibers and metal coated fibers, as recited in claim 41.

Accordingly, Applicants request that the Examiner reconsider and withdraw the rejection of claims 1, 2, 11 - 23, 25, 29 - 33, 35, 36, 38, 39, and 41 under 35 U.S.C. § 102(b) and indicate that these claims are allowable.

Traversal of Rejection Under 35 U.S.C. § 103(a)

1. Over Eddy

Applicants traverse the rejection of claims 12 and 13 under 35 U.S.C. § 103(a) as being unpatentable over EDDY. The Examiner acknowledges that EDDY fails to disclose fillers made of metal coated fibers, but asserts that it would have been obvious to include such fibers. Applicants traverse the Examiner's assertions.

Applicants again note that, as EDDY is specifically designed and intended to radiate heat outwardly from its core in order to transfer heat to other surfaces in the copier/printer in order to fuse the toner powder image onto a support or sheet, EDDY fails to provide any

teaching or suggestion of a roller having an elastic coating with a smooth surface structured and arranged for smoothing a paper web, as recited in at least independent claim 1.

Further, as EDDY intends only to generate heat outwardly, there is no teaching or suggestion of fillers arranged to improve *thermal conductivity* of said elastic coating layer such that *heat is dissipated toward the hard roller core* and *dissipated axially by the hard roller core*, as recited in at least independent claim 1. In fact, as EDDY expressly discloses that a heating element is located in the core to effect the outward radiation of heat, any asserted modification of EDDY to dissipate heat, as asserted by the Examiner, would be contrary to the express disclosure and intended operation of EDDY. Thus, Applicants submit that EDDY fails to render unpatentable the features recited in at least independent claim 1.

Moreover, as EDDY only teaches heat emanation, this document fails to provide any teaching or suggestion of any benefits that could be attained by arranging the filler to improve *thermal conductivity* of said elastic coating layer such that *heat is dissipated toward the hard roller core* and dissipated axially by the hard roller core, in the manner set forth in at least independent claim 1. As such, Applicants submit that one ordinarily skilled in the art reviewing EDDY would not appreciate the heat dissipation characteristics available by a particular arrangement of the metallic fillers, unless they had also reviewed the instant specification. In other words, Applicants submit that only reason for modifying EDDY in the manner asserted by the Examiner is by the application of impermissible hindsight after

reviewing the instant disclosure, which renders the rejection improper.

Further, Applicants note that, as EDDY is also expressly intended for use in a copier/printer, there is no teaching or suggestion for forming the roll to have the dimensions recited in independent claim 1, as now amended. Further, as there is no teaching or suggestion in EDDY with regard to pressures exerted on or by the fusing roll, Applicants submit that this document cannot render unpatentable the features regarding a structure and arrangement to withstand the recited compressive strain in at least independent claim 1, as now amended.

Because EDDY fails to teach or suggest at least the above-noted features of the instant invention, Applicants submit that EDDY fails to render unpatentable the combination of features recited in at least independent claim 1, and, therefore, fails to render the instant invention unpatentable under 35 U.S.C. § 103(a).

Further, Applicants submit that claims 12 and 13 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicants submit that no proper modification of EDDY teaches or suggests, *inter alia*, the at least a portion of said metallic fillers comprises one of metal-coated fibers and metal-coated rovings, as recited in claim 12; and fibers of said one of said metal-coated fibers and said metal-coated rovings comprise at least one of carbon and glass, as recited in claim 13.

Accordingly, Applicants request that the Examiner reconsider and withdraw the rejection of claims 12 and 13 under 35 U.S.C. § 103(a) and indicate that these claims are allowable.

2. Over Eddy in view of Sukenik

Applicants traverse the rejection of claim 24 under 35 U.S.C. § 103(a) as being unpatentable over EDDY in view of SUKENIK (U.S. Patent No. 3,852,862). The Examiner acknowledges that EDDY fails to disclose additional fillers including at least one of quartz or PTFE, but asserts that it would have been obvious to include such fillers in view of SUKENIK. Applicants traverse the Examiner's assertions.

Applicants note that SUKENIK fails to provide any teaching or suggestion of the subject matter noted above as deficient in EDDY. In particular, Applicants submit that SUKENIK fails to teach or suggest fillers arranged to improve *thermal conductivity* of said elastic coating layer such that *heat is dissipated toward the hard roller core* and *dissipated axially by the hard roller core*, and a roller having an elastic coating with a smooth surface structured and arranged for smoothing a paper web, as recited in at least independent claim 1.

Because neither applied document teaches or suggests at least the above-noted features of the invention, Applicants submit that no proper combination of the applied documents can render unpatentable the combination of features recited in at least

independent claim 1.

Further, Applicants submit that, as SUKENIK fails to provide any teaching or suggestion for modifying EDDY in a manner contrary to its intended manner of operation, i.e., to dissipate heat radially inwardly rather than generate heat radially outwardly, the art of record fails to provide the necessary motivation or rationale for modifying EDDY in the manner asserted by the Examiner.

Moreover, Applicants note that, as SUKENIK is not directed to a roll for increasing the heating capacity of a roll in the manner of EDDY, it is not apparent whether modifying EDDY to include quartz or PTFE fillers would enable the modified roll of EDDY to operate in its intended manner. Thus, Applicants submit that the asserted combination of EDDY and SUKENIK is improper and should be withdrawn. Still further, even assuming, *arguendo*, that such a modification were proper (which Applicants submit it is not), Applicants submit that it is not apparent that the resulting roll would render unpatentable the combination of features recited in at least independent claim 1.

Accordingly, Applicants submit that no proper combination of EDDY and SUKENIK can render the instant invention obvious. Further, Applicants submit that claim 24 is allowable at least for the reason that it depends from an allowable base claim and because it recites additional features that further defines the present invention. In particular, Applicants submit that no proper combination of EDDY in view of SUKENIK teaches or

suggests, *inter alia*, said additional fillers comprise at least one of quartz and PTFE, as recited in claim 24.

Accordingly, Applicants request that the Examiner reconsider and withdraw the rejection of claim 24 under 35 U.S.C. § 103(a) and indicate that this claim is allowable.

3. Over Eddy in view of Brouwer

Applicants traverse the rejection of claims 26 and 27 under 35 U.S.C. § 103(a) as being unpatentable over EDDY in view of BROUWER (U.S. Patent No. 5,735,388). The Examiner acknowledges that EDDY fails to disclose fillers penetrating the outer surface or an outer surface coated with metal, but asserts that it would have been obvious to do so according to the teaching of BROUWER.

Applicants note that BROUWER fails to provide any teaching or suggestion of the subject matter noted above as deficient in EDDY. In particular, Applicants submit that BROUWER fails to teach or suggest fillers arranged to improve *thermal conductivity* of said elastic coating layer such that *heat is dissipated toward the hard roller core* and *dissipated axially by the hard roller core*, and a roller having an elastic coating with a smooth surface structured and arranged for smoothing a paper web, as recited in at least independent claim 1.

Because neither applied document teaches or suggests at least the above-noted features of the invention, Applicants submit that no proper combination of the applied

documents can render unpatentable the combination of features recited in at least independent claim 1.

Further, Applicants submit that, as BROUWER fails to provide any teaching or suggestion for modifying EDDY in a manner contrary to its intended manner of operation, i.e., to dissipate heat radially inwardly rather than generate heat radially outwardly, the art of record fails to provide the necessary motivation or rationale for modifying EDDY in the manner asserted by the Examiner.

Moreover, Applicants note that, as BROUWER is not directed to a roll for increasing the heating capacity of a roll in the manner of EDDY, it is not apparent whether modifying EDDY in view of BROUWER would enable the modified roll of EDDY to operate in its intended manner. Further, Applicants note that, as BROUWER specifically discloses the surface of the roll is intended to be erose, there is no teaching or suggestion that it would have been obvious to provide such a surface to fusing roller of EDDY, or that EDDY would continue to operate in its intended manner were the erose surface of BROUWER imported into the EDDY roll.

Thus, Applicants submit that the asserted combination of EDDY and BROUWER is improper and should be withdrawn.

Accordingly, Applicants submit that no proper combination of EDDY and BROUWER can render the instant invention obvious. Further, Applicants submit that claims

26 and 27 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further defines the present invention. In particular, Applicants submit that no proper combination of EDDY in view of BROUWER teaches or suggests, *inter alia*, said metallic fillers are arranged to penetrate said radially outer surface, as recited in claim 26; and a radially outer surface of said elastic matrix material is coated with metal, as recited in claim 27.

Accordingly, Applicants request that the Examiner reconsider and withdraw the rejection of claim 24 under 35 U.S.C. § 103(a) and indicate that this claim is allowable.

4. Over Eddy in view of Yamamoto

Applicants traverse the rejection of claim 34 under 35 U.S.C. § 103(a) as being unpatentable over EDDY in view of YAMAMOTO et al. (U.S. Patent No. 4,990,963) [hereinafter “YAMAMOTO”]. The Examiner acknowledges that EDDY fails to disclose the plastic material includes one of thermosetting resin or thermoplastic resin, but asserts that it would have been obvious to modify EDDY to include such features in view of the teachings of YAMAMOTO. Applicants traverse the Examiner’s assertions.

Applicants note that YAMAMOTO fails to provide any teaching or suggestion of the subject matter noted above as deficient in EDDY. In particular, Applicants submit that YAMAMOTO fails to teach or suggest fillers arranged to improve *thermal conductivity* of said elastic coating layer such that *heat is dissipated toward the hard roller core* and

dissipated axially by the hard roller core, and a roller having an elastic coating with a smooth surface structured and arranged for smoothing a paper web, as recited in at least independent claim 1.

Because neither applied document teaches or suggests at least the above-noted features of the invention, Applicants submit that no proper combination of the applied documents can render unpatentable the combination of features recited in at least independent claim 1.

Further, Applicants submit that, as YAMAMOTO fails to provide any teaching or suggestion for modifying EDDY in a manner contrary to its intended manner of operation, i.e., to dissipate heat radially inwardly rather than generate heat radially outwardly, the art of record fails to provide the necessary motivation or rationale for modifying EDDY in the manner asserted by the Examiner.

Moreover, Applicants note that, as YAMAMOTO is not directed to a roll for increasing the heating capacity of a roll in the manner of EDDY, but is instead directed to an electrostatic latent image carrier, it is not apparent whether modifying the fusing roller of EDDY in view of teachings related to the wholly distinct and operationally different roller of YAMAMOTO would enable the modified roll of EDDY to operate in its intended manner. Thus, Applicants submit that the asserted combination of EDDY and YAMAMOTO is improper and should be withdrawn. Still further, even assuming, *arguendo*, that such a

modification were proper (which Applicants submit it is not), Applicants submit that it is not apparent that the resulting roll would render unpatentable the combination of features recited in at least independent claim 1.

Accordingly, Applicants submit that no proper combination of EDDY and YAMAMOTO can render the instant invention obvious. Further, Applicants submit that claim 34 is allowable at least for the reason that it depends from an allowable base claim and because it recites additional features that further defines the present invention. In particular, Applicants submit that no proper combination of EDDY in view of YAMAMOTO teaches or suggests, *inter alia*, said plastic material comprises one of a thermosetting resin and a thermoplastic material, as recited in claim 34.

Accordingly, Applicants request that the Examiner reconsider and withdraw the rejection of claim 34 under 35 U.S.C. § 103(a) and indicate that this claim is allowable.

Request for Rejoinder of Subject Matter Directed to Non-Elected Species

Applicants request that, as independent claim 1 has been shown to be allowable over the art of record, and as independent claim 1 is generic to each of the identified species of the elected invention, the Examiner rejoin claims 4 - 10, 37, and 40, directed to the subject matter of the non-elected species, and consider the merits of the same.

Further, Applicants request that the Examiner indicate the allowability of claims 4 - 10, 37, and 40 in the next official communication.

Request for Rejoinder of Claims Directed to Non-Elected Invention

By the present amendment, claim 42 has been amended to recite the features of the apparatus in the process of making the apparatus. As the apparatus has been shown to be allowable, Applicants request that the Examiner rejoin claims 42 - 60, directed to the non-elected invention, and consider the merits of the same.

Further, Applicants request that the Examiner indicate the allowability of claims 42 - 60 in the next official communication.

Application is Allowable

Thus, Applicants respectfully submit that each and every pending claim of the present invention meets the requirements for patentability under 35 U.S.C. §§ 102 and 103, and respectfully request the Examiner to indicate allowance of each and every pending claim of the present invention.

Authorization to Charge Deposit Account

The Commissioner is authorized to charge to Deposit Account No. 19 - 0089 any necessary fees, including any extensions of time fees required to place the application in condition for allowance by Examiner's Amendment, in order to maintain pendency of this application.

CONCLUSION

In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious the Applicants' invention, as recited in each of claims 1 - 3, 11 - 27, 29 - 36, 38, 39, and 41, as well as claims


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4 - 10, 37, and 40, directed to the subject matter of the non-elected species, and claims 42 - 60, directed to the non-elected invention. The applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.

Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Accordingly, reconsideration of the outstanding Office Action and allowance of the present application and all the claims therein are respectfully requested and now believed to be appropriate.

Respectfully submitted,
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